

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF ALEXANDRIA

Teresa Fannon  
831 Herbert Springs Rd.  
Alexandria, VA 22308  
Plaintiff

v.

Floor and Decor Outlets of America, Inc.,  
a Subsidiary of Floor & Door Holdings, Inc.  
t/a Floor & Decor  
4607 Eisenhower Ave, Alexandria, VA 22304

Defendant

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J. GREG PARKS, CLERK

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CLERK OF COURTS  
CITY OF ALEXANDRIA

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Serve:

Floor and Decor Outlets of America, Inc.,  
a Subsidiary of Floor & Door Holdings, Inc.  
t/a Floor & Decor  
c/o C T CORPORATION SYSTEM  
4701 Cox Rd Ste 285, Glen Allen, VA, 23060 - 6808

COMPLAINT

COMES NOW, the Plaintiff, Teresa Fannon, by Counsel, and files this Complaint and moves for judgment against the Defendant, Floor and Decor Outlets of America, Inc., a Subsidiary of Floor & Door Holdings, Inc., t/a Floor & Decor, ("Floor & Decor") on the grounds and in the amount as hereinafter set forth:

1. The Plaintiff, Teresa Fannon is an adult resident of the Commonwealth of Virginia.
2. The Defendant, Floor & Decor, own, operate and manage the retail sales outlet store at 4607 Eisenhower Ave, Alexandria, VA 22304.
3. On or about July 28, 2021, Plaintiff was a customer at the sales outlet store, shopping for tiles for a home renovation.



4. As Plaintiff and her husband walked up the right side of the aisle, they reviewed the floor patterns on display. Upon selecting the pattern nearest to a red sign, Plaintiff turned to view the wall tiles which were displayed on the left side, as her husband snapped a picture of the floor tile. A totally empty pallet was positioned flat on the floor immediately behind her, and as she stepped and turned, her foot went into the slot where forks enter. Plaintiff had no possibility of recovery and fell straight to the floor, unable to bring the trapped foot forward or fall to her knees. Her arm went out, then she hit face first on the concrete floor, suffering several broken and damaged teeth, an arm broken in two places, and a concussion, among other injuries.

5. The Defendant owed the duty to the Plaintiff and others to maintain the common walk areas in a reasonably safe condition, free from known and latent defects, trip hazards and hazardous conditions.

8. The Defendant breached the duties owed to the Plaintiff in the following manner: The Defendants placed and thereafter failed to remove an empty flat pallet in the middle of a walking aisle; failed to properly supervise and inspect the common walk area in question so as to furnish to the Plaintiff a safe walking surface free from hazards it created; the Defendant failed to maintain the walk aisle floor area in a safe condition to insure that the Plaintiff would not be caused to trip and fall as a result of the empty pallet and was otherwise negligent by failing to warn the Plaintiff of such latent hazardous condition.

8. As a result of the negligence of the Defendant, the Plaintiff sustained serious and severe injuries; has incurred and will in the future incur medical expenses and a loss of income, loss of earnings and earning capacity. She suffered great pain, inconvenience, embarrassment

and mental anguish. She has, may, and probably will for an indefinite time in the future be deprived of ordinary pleasures of life, loss of well being, and that overall health, strength, and viability has been greatly impaired.

WHEREFORE, the Plaintiff, Teresa Fannon, moves for Judgment against the Defendant, Floor and Decor Outlets of America, Inc., a Subsidiary of Floor & Door Holdings, Inc. t/a Floor & Décor in the amount of FIVE HUNDRED THOUSAND DOLLARS (\$500,000.00), including interest from July 28, 2021, together with the costs of this action and such other and further relief as the Court deems just and proper.

TERESA FANNON

By:



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Counsel for Plaintiff

**JURY TRIAL DEMANDED**